

I strongly support RM-10352. It is well established that narrowband modes such as CW suffer far more from interference when intermixed with wideband modes such as SSB or Image (such as slow scan TV). As an experienced operator, I can attest that nearby SSB stations render weak-signal CW work essentially impossible. FCC has long established protected band segments on all other HF bands where only narrowband modes are permitted. This has proven quite workable and has permitted robust and enthusiastic utilization by CW and digital mode operators over the years. The amateur 160 meter band is an exception. There are no present restrictions on wideband mode useage. It has become obvious that there are some diehard phone operators who feel that they 'own' particular frequencies, despite explicit FCC requirements that license applicants disavow any such 'rights' in order to obtain a license to operate. This behavior has been in violation of both traditional 'gentlemen's agreements' concerning band use, and later the ARRL bandplan which formalized the well established idea that a reserved band segment was needed for narrowband modes. Significantly, this interference went on unabated, despite the ARRL bandplan, until Riley Hollingsworth of the FCC sent letters to the offending parties asking them to justify their non-conformance. These operators had persisted in using a frequency that was extremely detrimental to weak-signal operations, despite repeated pleas from their fellow radio operators to move to another frequency in what was uncontestably not at the time a crowded band. I might add that overseas operators have often only a very narrow band segment where they are permitted to operate- this means that moving the CW operations elsewhere in the band is not an option. It is easy for the phone operators to move frequency, on the other hand, should they choose to. Reserving the lower end of HF bands for narrowband is well established in precedent and works well, allowing all the modes to coexist peacefully. It should be applied to the 160 meter band in recognition of its great value for weak-signal narrowband mode work, which is clearly growing, as supported by evidence cited in RM-10352.

An additional problem has been the result of encroachment for a few weekends each year during phone (SSB) contests, where true band congestion causes many otherwise good operators to violate the ARRL bandplan strictly because of its voluntary nature. This destroys any possibility of doing weak-signal CW work for the duration. There are many operators who are 100 percent CW and 160 meter specialists, and they are shut down for the duration during these phone contests.

It is also worth considering that, in the absence of a mandated band segment for narrowband modes, there is no guarantee that some phone operators will not later decide to litigate against the FCC to reestablish their right to use wideband modes on all of the 160 meter band, despite FCC efforts to encourage conformance with the ARRL bandplan. Bandplans are in the final analysis advisory and not binding- at least that is what I believe the courts might ultimately find.

Best Regards,
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